



**AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

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Mr. Anthony Fazio  
Director, Office of Rulemaking, ARM-1  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

Dear Mr. <sup>Tony</sup>Fazio:

On behalf of the Air Line Pilots Association, I would like to comment on the recently submitted report of the Fuel Tank Inerting Harmonization Working Group.

We appreciated the opportunity to participate on this working group. We firmly believe that fuel tank inerting is a technically feasible technique that will help preclude fuel tank explosions in the future. We have concerns about the cost benefit analysis assumptions that were used by the working group. We feel using the predetermined DOT figure of \$2.7 million per human life lost is unreasonably low.

The Working Group report identifies many recommendations by the membership to continue fuel tank inerting research to improve the efficiency of the systems. At the ARAC Executive Committee meeting that received the working group report last month, it was indicated that work on developing a viable fuel tank inerting process is continuing. Future design/production aircraft could be modified on the drawing board to be compatible with the demands of an inerting system.

We certainly support this work and want to see it continue.

Sincerely yours,

William W. Edmunds, Jr.  
Senior Human Performance Specialist